

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ROOPAL P. LUHANA
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Exhibit A to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit B to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit C to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit D to the Declaration of B. Wilkins in support of	References to information deemed confidential	Uber

1	Plaintiffs' Statement in Joint Discovery Brief		
2	Exhibit E to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
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4	Exhibit F to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
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6	Exhibit G to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
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8	Exhibit H to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
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11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed this 15th day of September, 2025 in Brooklyn, New York.

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15 /s/ Roopal P. Luhana
16 Roopal P. Luhana
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